



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 5, 2025

By Email and ECF

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_050147	Records from the New York State Executive Chamber
EDNY_050148-EDNY_050227	Records of physical surveillance of Linda Sun and Chris Hu
EDNY_050228-EDNY_052185	Records produced by Tax Preparer Adam Baruch
EDNY_052186-EDNY_052186	Responsive Chats from Linda Sun's iCloud
EDNY_052187-EDNY_052187	Responsive Chats from Chris Hu's iCloud
EDNY_052188-EDNY_052188	Responsive Chats from CC-1's iCloud
EDNY_052189-EDNY_052646	Digital scans of documents from the Sun/Hu residence, previously presented to defense counsel for inspection on 10/04/2024 and 10/31/2024

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOHN J. DURHAM
United States Attorney
Eastern District of New York

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Robert M. Pollack
Assistant U.S. Attorneys
(718) 254-7000